

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------------------|---|----------------------------|
| TARA F. BALDRIDGE, |) | |
| formerly known as |) | |
| TARA F. OWENS, |) | |
| on behalf of herself and |) | |
| the classes defined herein, |) | |
| |) | |
| Plaintiff, |) | 07 CV 6397 |
| |) | Judge Pallmeyer |
| vs. |) | Magistrate Judge Schenkier |
| |) | |
| PALISADES ACQUISITION XVI, LLC, and |) | |
| BLATT, HASENMILLER, LEIBSKER & |) | |
| MOORE, LLC, |) | |
| |) | |
| Defendants. |) | |

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to FRCP 26(f), a meeting was held on January 18, 2008 via telephone and was attended by Francis R. Greene, attorney for Plaintiff, and Jennifer W. Weller, attorney for Defendants.

2. The parties jointly propose to the Court the following discovery plan. However, Defendants believe that discovery should be stayed pending the resolution of Defendants' motion to dismiss. In the event the Court is inclined to stay discovery, then these dates would have to be revised.

a. Discovery will be needed on the following subjects:

- 1) Issues relating to Plaintiff's motion for class certification, including the size of the class.
- 2) Issues relating to the merits of Plaintiff's claims, including Plaintiff's allegation that Defendants have a policy of filing suits using the name of

an entity with no interest in the debt sued on. (Defendants deny Plaintiff's allegations.)

3) Any defenses asserted by Defendants including any asserted bona fide error defense.

b. Disclosures pursuant to FRCP 26(a)(1) to be made by February 5, 2008.

All discovery to be completed by August 23, 2008.

c. The parties expect they will need approximately 4 depositions.

d. Reports from retained experts under Rule 26(a)(2) due from Plaintiff by June 23, 2008 and from Defendants by July 23, 2008 .

e. Parties should be allowed until May 23, 2008 to join additional parties and to amend the pleadings.

f. All potentially dispositive motions should be filed by September 23, 2008.

g. Plaintiff to prepare proposed draft of pretrial order by _____; parties to file joint final pretrial order by _____.

h. The case should be ready for trial by _____ and at this time is expected to take approximately _____.

3. The parties do not consent unanimously to proceed before a Magistrate Judge at this time.

Dated: January 18, 2008

s/Francis R. Greene
Francis R. Greene

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
Francis R. Greene

Respectfully Submitted,

s/Jennifer W. Weller
Jennifer W. Weller

David M. Schultz
Jennifer W. Weller
Stephen D. Vernon
HINSHAW & CULBERTSON, LLP

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CERTIFICATE OF SERVICE

I, Francis R. Greene, hereby certify that on January 18, 2008 I caused to be filed the foregoing documents with Clerk of the Court via the CM/ECF System, which sent notification of such filing to the following parties:

David M. Schultz
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Jennifer W. Weller
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Stephen D. Vernon
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s/Francis R. Greene
Francis R. Greene